



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

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NAVSTA NEWPORT RI
5090.3a

September 7, 1999

James Shafer, Remedial Project Manager
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090


Re: Draft-Final Old Fire Fighting Training Area (OFFTA) - Marine Ecological Risk
Assessment (ERA) Report

Dear Mr. Shafer:

EPA reviewed the *Draft Final Old Fire Fighting Training Marine Ecological Risk Assessment Report* dated July 1999 for technical sufficiency and incorporation of EPA's earlier comments. I am pleased that the ERA has been adequately revised to reflect the majority of prior EPA comments. Exceptions and additional comments are provided in Attachment A.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Old Fire Fighter Training Area. Please do not hesitate to contact me at (617) 918-1385 should you have any questions or wish to arrange a meeting.

Sincerely,



Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Melissa Griffin, NETC, Newport, RI
Cornell Rosiu, USEPA, Boston, MA
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Ken Finkelstein, NOAA, Boston, MA
Steven Parker, Tetra Tech-NUS, Wilmington, MA
Mary Philcox, URI, Portsmouth, RI
David Egan, TAG recipient, East Greenwich, RI

ATTACHMENT A

<u>Page</u>	<u>Comment</u>
§4.4	It does not appear as if all of the figures and tables provided in the transmittal of additional text for uncertainty provided in June 1999 have been incorporated into the uncertainty section or an appendix of this version of the ERA. These data presentations are useful to support retaining OFF-23 as a reference condition.
p. 4-33, §4.4	It is stated in the first sentence of the last paragraph that results of site/baseline ratios for normalized sediment and tissue concentrations are summarized in Tables 4.4-1 and 4.4-2, respectively. These two tables are not included with the rest of the Chapter 4 tables. Tables 4.4-1 and 4.4-2 should be included in subsequent versions of this ERA.
Table 6.2-2, §6.0	Table 6.2-2 presents the tissue screening concentration (TSC) benchmarks. The table has been appropriately revised to provide derivation information. The TSC values for metals have changed significantly from the version provided in draft ERA. This change is owing to the update of water quality screening values. However, it appears as if some of the bioconcentration factors (BCFs) have also been revised. For example the TSCs for cadmium and chromium have significantly changed although the water quality screening criteria have not changed. Shepard 1998 was cited in the last version of the ERA and is again cited in this version of the table. The BCFs presented on the revised table are similar to the BCFs presented in Shepard 1998 as being from the Superfund Public Health Evaluation Manual, EPA 1986. However, no source citation is provided in Table 6.2-2 specifically for the BCFs. Please provide a source for the BCFs. Also, please clarify why the TSC benchmarks have changed for chemicals for which the water quality screening value have not changed.
Table 6.3-4, §6.0	This table presents the overall summary of TRV-dose HQs for avian aquatic receptors consuming prey. There is some information missing from the table that was not translated from Table 6.3-3. For the Cunner and Pitar, both the Heron and Gull risk rankings for OFF-23, are presented as low “+” in Table 6.3-3, but those cells are blank on Table 6.3-4. This information should be included in Table 6.3-4.

Table 6.6-1, §6.0 This table presents a summary of exposure-based weights of evidence for bedded sediment, resuspended sediment, and bioconcentration. This table has been revised to reflect earlier EPA comments and to adjust for the use of updated water quality screening criteria. However, there are still discrepancies in the table.

There are some discrepancies between Tables 6.2-1 (a and b) and Table 6.6-1. For example, the indigenous mussel rankings for OFF-02, OFF-05, and OFF-6 on Table 6.6-1 are not consistent with the ranks on Tables 6.2-1 (a and b). There are also discrepancies in the Mercenaria, Cunner, and Pitar rankings for other stations. These discrepancies should be corrected. Related information presented in Table 6.6-3 may also need to be revised to reflect changes to Table 6.6-1.

Also, as a minor point, the revised footnotes at the bottom of Table 6.6-1 do not include a footnote 3. There is a superscript 3 in the column labeled "Bioconcentration" and on the sub-heading "Ranking." The footnote 3 should be included in this table.

Table 6.6-2, §6.0 This table presents a summary of effects based weights of evidence for sediment toxicity, field effect indicators, and tissue residue effects. Footnote 2C specifies that Hematopoietic neoplasia information is presented in Table 5.3-4. This is not correct. Please change the footnote to refer the reader to Appendix B-2-3.

Table 6.6-3 This table provides the overall summary of exposure and effects-based weights of evidence and characterization of risk. The bedded sediment, resuspended sediment, and tissue residue effects rankings have been revised to either reflect prior comments or because of the use of updated water quality criteria. These revisions are consistent with the revised supporting tables.

§7.4 This section presents the ecological risk assessment conclusions. The conclusion presented for station OFF-05 is "determined to pose a high probability of ecological risk from harbor-related contaminants of concern." The conclusion that the contaminants of concern are "harbor-related" is out of place without supporting evidence (*e.g.*, a toxicity identification evaluation) and should more appropriately be discussed as a risk management issue in subsequent studies. Please delete "harbor-related."